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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Docket Management System
Doc. No. FAA-2004-17459-4
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Mount Rushmore National Memorial Air
Tours, Docket Number FAA-2004-17459

Dear Sir/Ms.:

This letter provides the U.S. Environmental Protection Agency's (EPA) comments for the proposed Environmental Assessment (EA) to develop an Air Tour Management Plan (ATMP) for the Mount Rushmore National Memorial, Docket Number FAA-2004-17459, pursuant to the National Parks Air Tour Management Act of 2000 (P.L. 106-181). Our comments are in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We understand that, "The objective of the ATMP is to develop acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tour operations upon the natural and cultural resources, visitor experiences, and tribal lands of the subject national park unit."

EPA expects to see air traffic projections in the EA described in a way that allows for evaluating discharges to the air and aquatic environments, noise impacts to affected urbanized and natural environments, and other effects of the proposed actions.

According to information from the US-Citizens Aviation Watch, major airports are among the largest sources of hazardous and toxic emissions in the United States. Airports are not required to report their emissions and do not have emissions standards, partly because of their importance to U.S. commerce and security and because available technology and practices have limited efficacy to reduce hazardous and toxic emissions. However, public health impacts are not well studied nor documented for aviation emissions. Aircraft and airport operations may be significant sources of public health risk. One relatively recent study describes serious environmental risks to communities adjacent to airports and affected by airport operations



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(Natural Resources Defense Council, "Flying Off Course: Environmental Impacts of American Airports," October 1996). The EA should screen for air quality impacts and determine whether further air quality analysis is important. Should air quality emissions be deemed important, the EA may evaluate information on the regional emissions from airport-related sources and compare them to other regional sources for (1) volatile organic compounds (VOCs), (2) benzene, (3) butadiene, (4) formaldehyde, (5) nitrogen oxides (NO), (6) carbon monoxide (CO), and (7) hydrocarbons (HC).

There should be discussion of day-night noise level (DNL) contours for the existing and proposed air tour operations. The physical, health, social, recreation, and economic impacts related to noise should be discussed and consider the special cultural values associated with Mount Rushmore National Memorial and on affected Indian lands.

From a safety perspective, there should be an appropriate level of discussion regarding the potential for wildlife collisions with aircraft associated with current and future air tour operations, particularly if there are heavily used wildlife areas in the vicinity of the airports and in the affected National Park Service and Indian lands.

Should you have any questions concerning our comments, please contact Brad Crowder, who coordinated our comments, at (303) 312-6393. You may call me at (303) 312-6004.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Svoboda", with a large, sweeping flourish extending from the end of the signature.

Larry Svoboda
Director, NEPA Program
Ecosystem Protection and Remediation